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18 Attorneys for Plaintiff

11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE DISTRICT OF ARIZONA  
13

14 United States of America,  
15 Plaintiff,

16 vs.

17 Daniel David Rigmaiden,  
18 Defendant.  
19

CR-08-814-001-PHX-DGC  
**MOTION FOR ENLARGEMENT  
OF TIME**  
**(Second Request)**

20 The United States, by and through its attorneys undersigned, respectfully requests  
21 this Court enter an order enlarging the time for the government to complete its expert  
22 disclosures, including compliance with Rule 16(a)(1)(G); and Government Rule 404(b)  
23 notification, until Friday, April 11, 2014. The parties in the District of Arizona have  
24 agreed to a global plea agreement in this case. In so doing, the parties have agreed to  
25 resolve all outstanding issues regarding the charges in the case, restitution, the return of  
26 property, the forfeiture and abandonment of property, and the deletion data from seized  
27 digital media that may have been outside of the scope of the search warrants obtained in  
28 this case. The sole remaining issue with respect to this case and the global plea

1 agreement was the approval from the Criminal Division of the Department of Justice. On  
2 this date, the Criminal Division has advised the U.S. Attorney's Office in this District that  
3 has approved the proposed global agreement. As a result, the United States is seeking  
4 this extension in order to proceed with the possible change of plea and sentencing  
5 scheduled for Monday, April 7, 2014, at 3:00 p.m. Defendant DANIEL DAVID  
6 RIGMAIDEN has no objection to this motion.

7 It is expected that excludable delay under 18 U.S.C. § 3161(h) may occur as a  
8 result of this motion or an order based thereon.

9 Respectfully submitted this 27<sup>th</sup> day of March, 2014.

10 JOHN S. LEONARDO  
11 United States Attorney  
12 District of Arizona

13 S/ Frederick A. Battista

14 FREDERICK A. BATTISTA  
15 PETER S. SEXTON  
16 JAMES R. KNAPP  
Assistant U.S. Attorneys

17 **CERTIFICATE OF SERVICE**

18 I hereby certify that on March 27, 2014, I caused the attached document to be  
19 electronically transmitted to the Clerk's Office using the ECF system for filing and  
transmittal of a Notice of Electronic Filing to the following ECF registrant:

20 Philip Seplow  
21 Shadow Counsel for Defendant Daniel David Rigmaiden

22 A copy of the attached document was also mailed to:

23 Daniel David Rigmaiden  
24 Agency No. 10966111  
CCA-CADC  
25 PO Box 6300  
Florence, AZ 85132

26 S/Frederick A. Battista

27 FREDERICK A. BATTISTA  
28 Assistant U.S. Attorney